

# EXHIBIT 4

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Daily News, LP; The Chicago Tribune Company, LLC; Orlando Sentinel Communications Company, LLC; Sun-Sentinel Company, LLC; San Jose Mercury-News, LLC; DP Media Network, LLC; ORB Publishing, LLC; and Northwest Publications, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO, LLC, OPENAI GLOBAL, LLC, OAI CORPORATION, LLC, and OPENAI HOLDINGS, LLC,

Defendants.

Civil Action No. 1:24-cv-03285-SHS

**PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION TO OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC, AND OPENAI HOLDINGS, LLC**

Pursuant to the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York, (the “Local Civil Rules”), Plaintiffs Daily News, LP (the “New York Daily News”); The Chicago Tribune Company, LLC, (the “Chicago Tribune”); Orlando Sentinel Communications Company, LLC (the “Orlando Sentinel”); Sun-Sentinel Company, LLC (the “Sun-Sentinel”); San Jose Mercury-News, LLC (the “Mercury News”); DP Media Network, LLC (the “Denver Post”); ORB Publishing, LLC (the “Orange County Register”); and Northwest Publications, LLC (the “Pioneer Press”) (collectively the “Publishers”) request that OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OPCO LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC (“OpenAI Defendants”) produce the requested documents at the offices of Rothwell, Figg, Ernst and Manbeck, P.C., 901 New York Ave NW,

contained in outputs of Defendants' Generative AI Products and Services and how users respond to disclaimers regarding the accuracy or veracity of information contained in such outputs.

**REQUEST FOR PRODUCTION NO. 42:**

Documents concerning Defendants' efforts and abilities to monitor, log, analyze, quantify, assess, evaluate, or review user queries within any Generative AI Products and Services.

**REQUEST FOR PRODUCTION NO. 43:**

Any surveys, studies, analyses, or statistics on patterns and practices of any of Defendants' Generative AI Products and Services, including any mentions of the Publishers, such surveys, studies, analyses, or statistics regarding of user engagement within user queries and/or inclusion of links to the Publishers' Content in user queries or outputs.

**REQUEST FOR PRODUCTION NO. 44:**

Documents concerning any attempts to use Generative AI Products and Services to circumvent paywalls or other access control measures.

**REQUEST FOR PRODUCTION NO. 45:**

Query, session, and chat logs reflecting or analyzing user sessions related to the Publishers' Content within Defendants' Generative AI Products and Services, including, for each session, user queries paired with responses to those queries.

**REQUEST FOR PRODUCTION NO. 46:**

Documents sufficient to show how Defendants' Generative AI Products and Services generate suggested follow-up queries for users.

**REQUEST FOR PRODUCTION NO. 47:**

Documents concerning user engagement metrics, events, and analytics data collected during each user session, including duration, the number of prompts or queries that a user inputs per session, click-through data, fallback rates, and bounce rates.

the United States, including price quotes, price lists, subscription amounts, price announcements, and actual prices paid by customers.

**REQUEST FOR PRODUCTION NO. 74:**

All documents that you intend to rely upon at trial, in support of any motion, or to present to the Court for any purpose in this litigation.

**REQUEST FOR PRODUCTION NO. 75:**

All documents produced or otherwise provided by You to The New York Times Company in the litigation related to this case.

Dated: June 14, 2024

/s/Steven Lieberman

Steven Lieberman (SL8687)  
Jennifer B. Maisel (5096995)  
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Jenny L. Colgate (*admitted pro hac vice*)  
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**CERTIFICATE OF SERVICE**

It is hereby certified that, on June 14, 2004, the foregoing **PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION TO OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, AND OPENAI HOLDINGS, LLC** was served by email upon the following counsel of record for OpenAI Defendants:

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/s/Nasri V. B. Hage  
Nasri V. B. Hage